

# EXHIBIT 16

RESPONSE TO OMNIBUS OBJECTION

CLAIM #176136

I. CONTACT INFORMATION

A. Name: Hector M. Vazquez Claudio

B. Mailing Address: #550 Camino de los Jazmines  
Urb Veredas Gurabo P.R. 00778

C. Contact Home Phone: \_\_\_\_\_ Cell 787-579-8675

II. CAPTION

A. Clerk's Office

United States District Court  
Room 150 Federal Building  
San Juan Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al. (Debtors)

C. Case Number: 17 BK 3283 – LTS

D. Omnibus Objection regarding request for amounts not paid by the Commonwealth of Puerto Rico:

Proof of claim numbers:

Act #89 – Uniform Compensation and the July 1979 Romerazo Law

#49762 – Act 89 – *Romerazo* – Effective July 1, 1995

#94057 – June 8, 2008 Pay Scale Act – Step Increases

#96621 – Act 96 (2002) of Dr. Pedro Roselló – effective July 2002

Act 164 (2004) of Ms. Sila Calderón – effective January 2004

III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 Uniform Compensation – July 1979

Act 89 *Romerazo* – Effective July 1, 1995

June 6, 2008 Pay Scale Act – Step Increases

Act 96 (2002) of Dr. Pedro Roselló – effective July 2002

Act 164 (2004) of Ms. Sila M. Calderón – effective January 2004

## Letter of Justification

### Claim # 176136

Dear Sirs:

This letter is to justify the reason why I was unable to send the response to the Omnibus Objection on time. The reasons this was not possible were due to the fact that I had to care for my wife constantly following a delicate surgery, and I was unable to leave her alone to go and send the letter by mail.

My claim is based on money owed for unreceived pay raises under laws that were enacted during my years of service at the Communications Corporation from 1975 through the end of October 1986, and later I began with the Puerto Rico Telephone Company on November 24, 1986, and I retired on March 1, 2011.

Act 89, referred to as *Romerazo*, of July 1995, I do not agree with my claim being dismissed, due to the fact that the Communications Corporation was always a government agency, and so too was the Puerto Rico Telephone Company until 1999 when it was sold by the governor at the time, Pedro Roselló, and it was after that, that it became a private agency. As such, my claims are fair, as I have not received this money which I am entitled to.

Many thanks for your attention to this matter. I kindly ask that you consider the reason justifying my inability to send the response sooner, as my wife was bedridden and unable to care for herself.

Sincerely,

Hector M. Vazquez Claudio

Printed name

[signature]

Signature

#### IV. SUPPORTING DOCUMENTATION

Enclosed are documents demonstrating the years of service with the Puerto Rico Telephone Company, Guaynabo, Puerto Rico, from August 16, 1985 to May 1, 2006. I ended my career as an Administrative Assistant II (2) with the Puerto Rico Telephone Company, Guaynabo, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of service.

Enclosed are documents as evidence for this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

Hector M. Vazquez Claudio

Printed name

[signature]

Signature



PRT/CLARO  
P.O. Box 360998  
San Juan PR 00936-0998

[handwritten:] Evidence of the years worked at the Puerto Rico Telephone Company, from Nov. 24, 1986 to March [unclear] 1, 2011. Was an employee of the government agencies from 1975 to 1986 (C.C.P.R.) and from 1986 to 2011 (P.R.T.C.)

### **CERTIFICATION**

**HECTOR M. VAZQUEZ CLAUDIO**  
**XXX-XX-6248**

For the abovenamed former employee, we certify the following:

- He joined PRT/Claro effective 11/24/1986.
- He worked as a regular employee until 03/01/2011.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Friday, September 4, 2020.

**Abigail Alejandro González**

Abigail Alejandro González  
Compensation Officer  
Compensation and Records

*Evidence of the years that Hector Vazquez Claudio worked for the Communications Corporation as a government employee from 1975 to 1986, and from 1986 to 2011 he was an employee of the Puerto Rico Telephone Company.*

[seal:]

GOVERNMENT OF GOVERNMENT OF PUERTO RICO

PUERTO RICO

Administration for Government and Judiciary

Employee Retirement Systems

Claim

# 176136

### **CERTIFICATION**

I certify that, pursuant to the evidence on file in our automated system and in our files, **Héctor M. Vázquez Claudio**, Social Security **xxx-xx-6248**, was given Reimbursement of his Contributions (corresponding to the period from July 2, 1975 to November 18, 1986), which appears registered on August 5, 1987 (check number 1165903), pursuant to the provisions under Act 447 of May 15, 1951, as amended.

The breakdown of said reimbursement is shown below:

Contributions + Interest : \$5,924.18

Discounts

PP Debt

AEELA Debt 1,020.00

Net : \$4,904.18

Issued on this date, October 14, 2020, in San Juan, Puerto Rico.

I certify that the foregoing is correct:

[signature]

Marelin Sánchez Rodríguez

Supervisor

Account Liquidation

Participant Services Unit

[emblem:] RETIREMENT

437 Ave Ponce de León San Juan, PR 00917-3711 PO Box 42003 San Juan, PR 00940-2203  
[icon] comunicaciones@retiro.pr.gov [icon] 787.777.1500 [icon] 787.767.1108 [icon] www.retiro.pr.gov

*This letter was sent to request evidence of the years that Hector Vazquez Claudio worked for the CCPR from 1975 to 1986*

[emblem] Gmail

FARMACIA NAVARRO-CPY <fnavcopy@gmail.com>

**Request to Retirement for evidence of the Certification of Héctor M Vazquez Claudio's years of service with the Communications Corporation**

1 message

**Milagros Delgado** <milmay2004@yahoo.com>  
To: fnavcopy@gmail.com

Fri, Dec 2, 2022 at 2:38 p.m.

Evidence regarding Héctor M Vazquez Claudio

*Claim # 176136 \**

Mr. Héctor Vazquez Claudio's years of service began in 1975 and he retired in 2011, worked for the Corporation from 1975 to 1986  
He worked for the PRTC from 1986 to 2011

**From:** Milagros Delgado <milmay2004@yahoo.com>

**Date:** September 15, 2020, 1:04:46 p.m. AST

**To:** María Díaz Lopez <MDIAZ02@retiro.pr.gov>

**Subject: Re: Help online services**

Many thanks, Ms. María Días for your kind assistance. I pray to God that I receive this certification that my husband worked from 1975 to 1986 at the Retirement Corporation.

It is a certification, I don't need it to mention his salary, or his retirement benefits. It's to prove that he worked those years. I would be eternally grateful for whatever you can do in this regard. We need to send this certification to the US as soon as possible.

Many thanks.

Sent from my iPhone

On September 15, 2022 at 10:22 a.m., María Díaz Lopez  
<MDIAZ02@retiro.pr.gov> wrote:

GOOD MORNING,

PLEASE CONTACT MS. MARIA DIAZ FROM THE RETIREMENT SYSTEM  
ADMINISTRATION AT 787 777-1500 EXT 3311 OR 787 424-4833,  
MONDAY TO FRIDAY FROM 9:00 to 3:00 PM. THANK YOU.

**From:** Bernadette Matías Rodriguez

**Sent:** Monday, September 14, 2020 10:05 AM

**To:** Maria Diaz Lopez <MDIAZ02@retiro.pr.gov>; ServiceDesk  
<servicedesk@retiro.pr.gov>

*Claim # 176126*

*Héctor M. Vazquez Claudio*

Welcome to the electronic portal of Government and Judiciary Employee Retirement Systems Administration.

Agency at which you work or worked: COMMUNICATIONS CORPORATION

Telephone Number: (787) 579-8675

Last 4 digits of the Social Security number: 6248

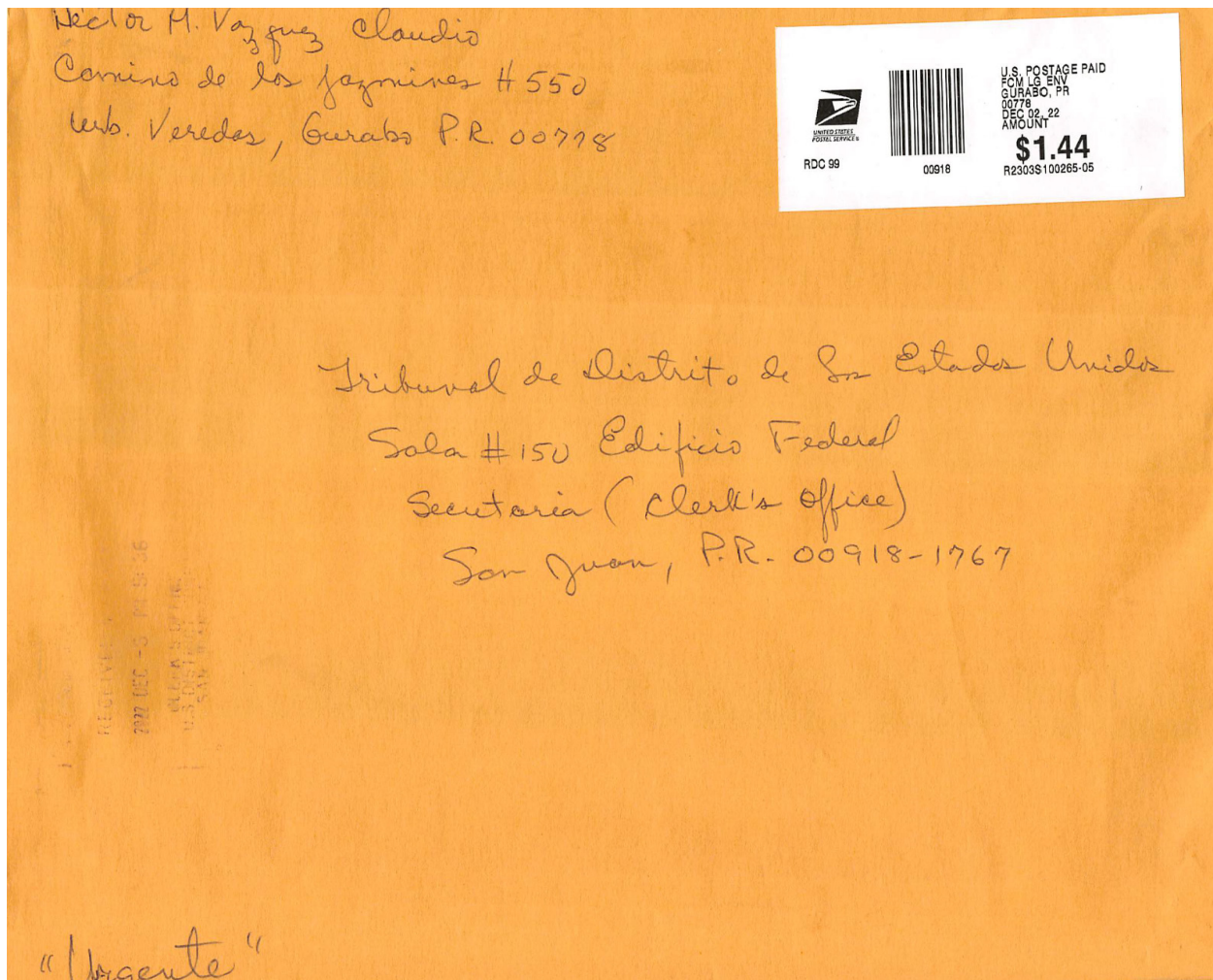
Email address: milmay2004@yahoo.com

Reason for contact: Request verification of employment from 1975 to 1986, I need it urgently to be able to bring a claim under Act 89 of 1995 – the Romerazo. I have until this week to file this claim and I have been unable to get through to you and I have trouble attaching the Driver's License because it won't accept it. How can I send it to you? My name is Héctor M. Vazquez Claudio, tel. 787-579-8675. Thank you for your urgent attention.

Your request will be processed soon.

Thank you for using our Online Services.

, <34ird14hmmp1gkrqzxn3otp-095646BF-8E7B-4616-AD1E-00EBEDC909F5.jpeg>





**T** 718.384.8040  
**W** TargemTranslations.com  
**E** projects@targemtranslations.com  
**A** 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **ECF 22995**

Signed this 18<sup>th</sup> of January 2023



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor', written over a horizontal line.

Andreea I. Boscor

